Augusta – Richmond County Continuum of Care FY2014 Request for Proposals (RFP) And Funding Guidelines

Contents

Introduction

Since 2001, Augusta Housing and Community Development (AHCDD), the lead agency for the Augusta - Richmond County Continuum of Care (CoC), has coordinated the process to submit the annual consolidated application for U.S. Department of Housing and Urban Development's (HUD) CoC Homeless Assistance Program funding.

Since 2000, through the leadership of AHCDD and the collaborative efforts of both the private and public sectors, the Augusta - Richmond County CoC has been successful in bringing over $15 million federal dollars into our community for homeless housing and services.

FY2014 Funding Availability Notice:

Approximately $189,000 in new funding is available through this RFP for new Permanent Supportive Housing Projects located in Augusta – Richmond County.

For each CoC nationwide, HUD establishes a pro-rata share, an amount that represents the maximum amount of money for which a community may compete. This share is based upon a formula that uses census and poverty data. CoC funding is a competitive national process - CoCs will only get funded if their community's consolidated application score meets or exceeds the scoring threshold.

Annually, HUD releases a Notice of Funding Availability (NOFA) of federal funding for CoC Homeless Assistance Programs funding. It is a collaborative application process – each CoC submits both a Consolidated Application and a Project Priority list. The Consolidated Application is a community profile of homeless housing and services and its action plan, and a Project Priority List that includes each ranked Project Application from the CoC.

Changes for 2014

• *For the first time the NOFA issued in 2013 covered both FY 2013 and FY 2014. The CoC Application submitted in February of 2014 covered both years and will not be submitted again until FY2015 Funding is available.*

• *Project Applications submitted in February 2014 were only for FY2013. HUD's deadline for the submission of 2014 project applications is October 30th, 2014 (HUD approved the 2014 budget on January 16, 2014)*

• *New projects can only be created through reallocation; reducing funding for existing projects to make funding available for new projects. Eligible new projects are Permanent Supportive Housing projects serving only the chronically homeless population or Rapid Re-Housing projects serving households with children.*

• *HUD adopted new Project Selection Priorities*

As a result of stagnant federal funding and a growing pool of projects eligible for first-time renewal across the nation, AHCDD is again anticipating an extremely difficult decision-making process this year.

With the implementation of the HEARTH (Homeless Emergency Assistance and Rapid Transition) Act regulations and significant changes in the 2012 and 2013/2014 Notice of Funding Availability (NOFA), HUD's priorities are now clear. It must be stressed that the CoC is competing with every Continuum in the country. In order to remain competitive and achieve the system-wide outcomes that HUD determines, it is necessary that the CoC ensures that funding is used efficiently and effectively. This will require changes in the manner in which we deliver housing/services to the homeless.

The Project Selection Committee will continue to score and rank all projects as part of the local application process. However, the Committee will also have to keep the CoC's competitiveness and HUD's priorities in mind when making final decisions on which projects will move forward in the HUD application process.

- A major item for review will be project budgets. There will be a line-by-line review and any unspent HUD funding will be taken into consideration. The CoC may not be able to fully fund items that were funded in the past.
- The target population that an agency serves may be considered in the final project selection in order to minimize the effect of anticipated budget cuts on homeless sub-populations.
- The Project Selection Committee will also review projects and rank them according to program type such as Permanent Supportive Housing, Transitional Housing and Supportive Services Only projects. The Project Selection Committee will determine how new projects are ranked and the effect it may have on renewal projects.

It must be fully understood that this is a nationally competitive grant application. In order to remain competitive, the CoC must put forth the best Consolidated Application and Project Applications possible in order to meet HUD's priorities and to best serve the homeless population of Augusta - Richmond Counties.

For the 2013/2014 funding cycle, Congress and HUD discouraged using across the board funding cuts to reach the required 5% reduction of the annual renewal demand. Reallocation is the only process where funds can be made available to create new projects that will support HEARTH Act goals of re-tooling the homeless system. Supporting these goals will keep the CoC Consolidated Application competitive nationally.

This policy guidebook is an effort to organize and inform the community of the policies and procedures that have been developed to guide both the local application process and the submission of the consolidated application to HUD for CoC funding. These policies were developed with the help of a committee of CoC members, shall be updated annually, and then approved by the CoC Executive Committee and, upon their designation, the Continuum's Board of Directors.
All information and forms pertaining to the process will be available on AHCDD website on the CoC page: http://www.augustaga.gov/71/Applications

Continuum of Care Programs/ Applicant Eligibility

The HEARTH Act Interim Rule was released; the final rule is pending. The HEARTH Act codifies in law the Continuum of Care planning process and enhances the coordinated response to addressing the needs of the homeless, which was established administratively by HUD in 1995. The single Continuum of Care program established by the HEARTH Act consolidates the following programs: the Supportive Housing program, the Shelter Plus Care program, and the Moderate Rehabilitation/Single Room Occupancy program. The Emergency Shelter Grants program was renamed the Emergency Solutions Grant program. It was revised to broaden existing emergency shelter and homelessness prevention activities and to add short- and medium-term rental assistance and services towards rapidly re-housing homeless people.

Applying for HUD CoC Program funding is a two- step process.

First, a local application is submitted in response to the Request for Proposal (RFP) released by the CoC. Applications are then scored and ranked based on multiple criteria and HUD priorities by a non-biased Project Selection Committee. A project priority list is then established based on ranking and the available funding for that year.

Projects that make the selection list will advance to the second step: submission of their project to HUD. This is done electronically through the E-snaps system. It is the responsibility of each project applicant to get their information entered into E-snaps. Once all individual project applications are entered into E-snaps, they are linked to the CoC GA-504 application and submitted as one submission package to HUD.

Changes for 2014

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• New projects can only be created through reallocation; reducing funding for existing projects to make funding available for new projects. Eligible new projects are Permanent Supportive Housing projects serving only the chronically homeless population or Rapid Re-Housing projects serving households with children.

• HUD adopted new Project Selection Priorities

There is no funding available for traditional bonus projects for 2013/2014.
New Projects that do not address at least one of these priority areas will not be scored and ranked as part of the local application process.

The FY2013/FY2014 NOFA required CoCs to make a mandatory 5% reduction to their Annual Renewal Demand (ARD), which is the total funding required to renew all eligible projects for one year. The NOFA also required the CoC to place projects into two tiers. Tier 1 represented projects ranked by the Project Selection Committee using both scoring and the new HUD project selection priorities that fell within the initial financial criteria set by HUD: the ARD minus 5%. Tier 2 represented the other projects that fit into the maximum HUD request, the ARD + CoC Planning Funds.

The FY2013/FY2014 NOFA included **HUD's Project Selection Priorities**, which are how HUD would select projects from Tier 1 and Tier 2. For the first time, HUD will select projects by their priorities rather than by the ranking of the local CoC process. As a result, the CoC must strategize how they rank projects differently than was done in the past.

The 2013/2014 HUD Project Selection Priorities are as follows:

(1) Renewal Permanent Housing (PH) projects (Permanent Supportive Housing (PSH) & Rapid Re-Housing (RRH)
(2) New reallocated PSH projects exclusively for the chronically homeless
(3) New reallocated RRH projects for households with children
(4) Renewal Transitional Housing (TH) projects
(5) Renewal Safe Haven (SH) projects.
(6) CoC Planning Funds
(7) UFA Funding
(8) Renewal Support Services Only (SSO) projects for Coordinated Entry
(9) Renewal HMIS projects
(10) Renewal SSO projects

If there are funds remaining, HUD will then go to Tier 2 projects. It will start with the highest scoring CoCs and select projects using the same project selection priorities until all available funds are awarded.

Request for Proposal (RFP) Process

The local Request for Proposals (RFP) is written in anticipation of an announcement by HUD of available funds. The RFP, local application forms, and general information can be downloaded from AHCDD's website. Notification of the release of the RFP is distributed throughout the community by use of an e-mail list serve. All organizations are encouraged to submit competitive proposals to AHCDD for the Continuum of Care funding competition.

The list of organizations that receive information about funding availability is diverse and includes: public- and private-sector organizations; homeless and non-homeless community-based nonprofit service providers; faith-based organizations; healthcare providers; and agencies that serve homeless sub-populations such as veterans, mentally ill, domestic violence, AIDS/HIV, and substance abusers. To

ensure the widest possible circulation of information, AHCDD encourages organizations to share the RFP information with any organization that might be interested. AHCDD also engages in special outreach efforts to individuals and nonprofit organizations at community meetings and presentations.

Shortly after the release of the RFP, a project applicant workshop will be scheduled. Representatives from organizations that are submitting renewal applications or considering applying for a new project are strongly encouraged to attend. Information presented will include an overview of the local process, review of definitions, and eligibility criteria. AHCDD staff will discuss any changes from the previous year's application, be the changes from the CoC or HUD, scoring criteria, etc.

Applicants are required to submit their local application by a specific date and time. *Failure to submit by the deadline will result in disqualification from the competition.*

The local application includes a cover sheet and a brief summary of organizational experience, project design, performance measurement, description of how the project addresses community needs, budget worksheets (including match and leveraging information), and project implementation timeline. In addition, applicants must specifically indicate how the proposed project aligns with HUD goals/strategies as outlined in **Opening Doors,** the federal strategic plan to end homelessness. This is consistent with the CoC's efforts to focus its resources on the populations most in need and the types of programs most needed in Augusta - Richmond County to address the communities' goals of preventing and ending homelessness.

All applicants must:
- Sign assurances
- Submit a copy of their last audited financial statement
- Submit any other attachments requested in the application.

Renewal applicants that have had a HUD monitoring visit since the previous year's competition are asked to attach a copy of their most recent monitoring report. Renewal applicants also need to submit a copy of the most recent Annual Performance Report (APR) submitted to HUD.

New Project Applications
_____

New projects can only be created through reallocation, which is reducing funding for existing projects to make funding available for new projects. Eligible activities are limited to new Permanent Supportive Housing projects exclusively serving the chronically homeless population, or Rapid Re-Housing projects serving households with children.

New project applicants are required to have a consultation with AHCDD staff. During this consultation, AHCDD may suggest changes to the project design, goals, or budget. Though these changes would not be mandatory, they are suggested to ensure that the agency has a competitive application to submit. Following the submission of the local application, the applicant will be contacted to schedule a site visit.

During the quantitative review of applications, if a New Project application demonstrates major deficiencies including but not limited to the following items of concern (below, corrective action may be required or applications may not be honored:

- Project designs that do not address Community Priority Areas as defined in the 2014 RFP
- Budgets which are not appropriate or accurate
- Lack of explanation about program design and effectiveness of models that are not recognized as best practice models;
- Missing or incomplete answers or answers that are not relevant to the questions provided; the application may be rejected without a site visit and would not advance for further review for that year.

New projects will be required to send a representative to meet with the Project Selection Committee on the day applications are rated and ranked to provide a brief project overview and answer any questions and respond to any concerns that committee members may have.

Applicants will be scored based on the local application, budget and attachments, the project's Annual Performance Report (APR), and other relevant information. See 2014 Scoring Criteria for specific scoring criteria.

Renewal Project Applications

Renewal projects will be asked to demonstrate how their program continues to address homeless needs and how it aligns with the goals of the Federal Strategic Plan (FSP) in "Opening Doors."

"Opening Doors" can be downloaded at http://www.usich.gov/opening_doors/

Renewal projects should not assume that continued HUD funding is automatic; projects that are performing poorly or no longer meet a community need may not be ranked high enough to advance to the federal competition. Due to stagnation and/or reductions in federal funding, it is also possible, even likely that projects that are performing well may be reduced or eliminated.

Though performance has always been important, it becomes even more crucial with implementation of the HEARTH Act. For the CoC to receive maximum scores in the Consolidated Application, system-wide performance measurements must be met. Examples of these benchmarks include: reducing repeat homeless episodes by stabilizing participants in permanent housing or reducing the average length of stay in the homeless system. Overall CoC performance is based on the aggregate data from each of the individual projects; therefore performance measurement criteria are weighted heavily in the scoring of applications.

Renewal projects should ensure that their application is complete and that their responses are appropriate and accurate. HMIS data should be up to date so performance data used accurately reflects the success of the program. There may be new elements in the application, therefore Renewal Project

applicants are strongly encouraged to read the questions and not just "cut and paste" all responses from a prior year into the current application. Applicants will be scored based on the local application, budget and attachments, the project's Annual Performance Report (APR), and other relevant information. See 2014 Scoring Criteria for specific scoring criteria.

2014 Rating/Ranking Process

As the FY2013-FY2014NOFA has already been released, this year the rating and ranking process will be conducted after the HUD announcement. Members of the CoC Project Selection Committee will read the applications and then rate and rank each project. In addition to reading the applications, Committee members are supplied with other information such as project performance, HMIS participation, information learned through site visits, etc. A rating form with scoring criteria is used to help reviewers determine scores in an objective manner. This form and criteria is subject to change on an annual basis.

A preliminary, quantitative review of each application submitted will be completed by AHCDD staff. This review will:

• Confirm that application was submitted on time
• Confirm that all required attachments were submitted
• Calculate performance scores based on HMIS data

• Assign HMIS participation data quality score
• Review budgets for accuracy and appropriateness
• Confirm matching and/or leveraging fund requirements are met
• Assign bonus points

Project applications and budget workbooks are sent to the Project Selection Committee members to read along with rating forms and scoring criteria.

For each section of the application, reviewers are asked to assign a score based on information in the application package and from the quantitative review. Total scores for each project are determined by adding up the points in each section and then adding any bonus points, if applicable. The preliminary scores are collected via email before the scheduled rating and ranking session. All new project applicants are required to be prepared, if asked, to come in and give a brief presentation and address questions/concerns with the Project Selection committee. The Project Selection Committee, due to time constraints, may require this meeting at any time during the open Competition process, with 24-hours' notice to the new project applicant. A maximum of ½ hour will be scheduled for the discussion and scoring of these project applications. A maximum of 15 minutes will be scheduled for the discussion and scoring of renewal projects. After the discussion of each application, reviewers have the opportunity to adjust their preliminary score by +5 or -5 points. All projects are scored on the same criteria as other projects of the same type. Scores are averaged and a project ranking list is then generated from highest to lowest average score.

After reviewing all new and renewal projects, the committee will review the final ranking and the preliminary allocation of funding. *It is possible for new projects to put renewal projects at risk*. Rankings may have to be adjusted based on HUD project selection priorities, uniqueness and need for the project in the community, as well as program type. Projects will be approved for submission to HUD based on the project funding requests that fall within the maximum HUD request that is allowed.

Renewal projects that did not meet two or more performance measurements may be placed on probation for a one year term due to performance concerns. AHCDD staff and/or project selection committee members will work with these projects over the subsequent year to develop a plan to improve program performance and monitor the progress with these efforts. If these efforts are not successful, projects will be at high risk for funding being eliminated and/or not be able to submit the following year.

There also may be new projects that fail to score well and are not moved forward for submission to HUD. These projects may request that the CoC Executive Committee and / or AHCDD Staff provide them with technical assistance to assist them in improving their application for future competitions. This process ensures that organizations that may lack the current capacity to receive a federal grant, can build their capacity for a future year.

Project Scoring

The maximum number of points for new and renewal projects is **150 points**. Additional bonus points are available for:
> • New or renewal projects that provide permanent supportive housing targeting 100% of their beds for the chronically homeless
> • Renewal PSH projects who do not exclusively serve the chronically homeless agree to prioritize 85% or more of turnover beds for the chronically homeless **and** 70% or more of turnover beds actually house chronically homeless
> • New projects that provide rapid re-housing for households with children
> • Renewal TH, SSO and PH programs where all performance benchmarks were met or exceeded

New Project Scoring: Applicants will be scored on project design, how the project addresses local priority need areas, how the project aligns with Opening Doors' national strategies to end homelessness, budget appropriateness and accuracy, project match, leveraging, community collaboration, housing to services funding request ratio, organizational capacity, and implementation timeline. Other factors include community involvement and information learned through the site visit and/or discussion period during the rating/ranking session. New Projects will be ranked in conjunction with Renewal Projects to ensure that the best applications are moved forward to the federal competition.

Part of the scoring of the Consolidated Application, the community portion of the consolidated application, is the **housing to service funding request ratio for new projects**. *The larger the ratio of funds being requested for housing rather than services, the higher the score.* **New project applications with a funding request of more than 30% of the total for services** *will not be reviewed*.

Commented [SF1]: Should this be 30%?

Renewal Project Scoring: Applicants will be scored on project design, description of how the project continues to address community needs, budget appropriateness and accuracy, project match, community collaboration, performance measurements, timely spending of HUD funds, and utilization rates. **26 points of a renewal project's score will be based on Pathways (HMIS) data quality and participation. 49 points will be based on performance measures.**

The Project Selection Committee primarily utilizes the most recent HUD Annual Performance Report (APR) to evaluate the performance of renewal programs. In particular, at least three HUD-identified performance measures and several locally determined measures may be used.

Additional performance measures may be added with full implementation of the HEARTH Act. Projects will be notified of these as they are released by HUD.

Performance and HMIS are the most heavily weighted measures used by HUD in determining the overall Consolidated Application score of local Continuums. Data taken from each project's Annual Performance Report submitted to HUD is used to calculate the overall CoC systems performance in moving to permanent housing, housing stability, and accessing mainstream resources and employment resources. Additionally, performance data collected helps the Augusta – Richmond County community to better define local homelessness issues and help to achieve the goal of ending homelessness. Participation in Pathways (HMIS) and quality data entry is mandatory for those agencies seeking new and renewal CoC funds.

APR performance measurements provide an objective evaluation of current program performance. They can be easily calculated measures and data entry is a limited but necessary burden on program providers. It provides the quantitative basis for scoring the performance of renewal projects in the CoC local application process and is used by the Project Selection Committee to assess the system wide progress of the Continuum in meeting their benchmarks.

Performance Measurements

Performance is the most heavily weighted criteria used by HUD when scoring Homeless Assistance Program applications. The burden of performance falls on both the CoC and the individual projects funded by the CoC. Therefore, it is crucial that all projects make every attempt possible to meet or exceed their program outcomes. The CoC will assist projects that are having difficulty in meeting objectives in any way they can.

New CoC benchmark performance measures were established in the 2013/2014 NOFA. These new benchmarks have been incorporated into the 2014 scoring criteria.

Assurances

Project applicants will be required to sign off agreeing to the following:
   • Applicant will complete HUD Exhibit forms with the same information as contained in this
      application unless there were adjustments made during the rating/ranking process. Those

adjustments would be included in your project ranking letter and supersede the original application submitted
• Applicant agrees to participate fully in Pathways, the local Homeless Management Information System (HMIS)
• Applicant agrees to abide by CoC Governance Charter, Membership Participation Agreement and any other written standards applicable to the project
• Applicant agrees to participate in the Coordinated Entry System which includes the use of a Common Assessment tool when fully implemented in the CoC
• Applicant understands that the CoC has arranged for HUD-funded homeless assistance projects to be monitored by AHCDD, beginning in FY2014, and may include an annual site monitoring visit, as well as the submission of the program's most recent Annual Performance Report sent to HUD and their most recent audited financial statement and any management letters if applicable when submitting their application.

Applicant understands that if funding is awarded, they are responsible to inform the CoC Executive Committee and AHCDD when:

- Changes to an existing project or change in sub-population served that is significantly different than what the funds were originally approved for, including any budget amendments submitted to HUD
- Increase/decrease of other funding to the project that could affect projected numbers of participants served, program staffing, performance, etc.
- Delays in the start-up of a new project
- Program is having difficulty in meeting projected numbers served or performance outcomes.

Appeals Process

If an applicant organization feels it was denied the right to reasonably participate in the local application process or has been unfairly eliminated from either the local or the federal competition, that a decision made by the CoC Project Selection committee regarding the ranking, rejection, or funding of their project was prejudicial, unsubstantiated by project performance, or in violation of the 2014 Continuum of Care Guidelines, the applying lead agency and sponsor if any may file an appeal to be re-considered for inclusion in either the local competition or federal competition.

A written appeal request must be submitted to AHCDD within five (5) business days of the notice of the decision. The CoC's Project Selection Committee will hear all appeals. It is the responsibility of the Applicant to address each area(s) identified as a factor(s) of the funding decision in a manner that could result in a more favorable decision.

Submission Requirements and Formats

A. Application
Proposals for use of the HEARTH Act funds must be completed on – **Appendix C** – *Augusta – Richmond County FY2014 Continuum of Care Homeless Assistance Grant Application.*

B. Application Submission Format
The Continuum shall only accept electronically submitted HUD applications that conform to the following guidelines:

> 1. Files should be saved as Microsoft Office documents compatible with Office 2007.
>
> 2. All scanned documents shall be saved only as PDF formatted files with resolution set no less than 100 dpi or greater than 400 dpi. OHS and the Grant Review Committee shall not review documents submitted as JPG, TIF or other graphical formats.
>
> 3. All forms and narratives must be prepared using an 11 point Times New Roman font.

C. Application Submission Process/Instructions
Please see below for proper steps in submitting the required electronic portion of your project application.

E-snaps Submission

HUD requires electronic submission of all federal application materials using E-snaps. *Applicants are responsible to enter their Project Applications and to upload any required attachments into the E-snaps system. The deadline for this will be approximately two weeks before the actual HUD deadline. This will allow sufficient time for the CoC to review submitted materials for accuracy and to build the project applicant list that electronically connects each of the projects CoC GA-504.* More details on these procedures will be available at the Applicant Workshop and upon your project's selection to move forward into the federal competition.

New applicants need to make sure they have registered with E-snaps and renewal applicants need to make sure their profile has been updated. *Please Note:* This site is ***not*** the same as Grants.gov and agencies should not underestimate the time it will take to register with E-SNAPS. You can register here: https://esnaps.hud.gov/grantium/frontOffice.jsf.

There are excellent E-snaps training materials available on the OneCPD Homeless Resource Exchange website, www.onecpd.info

Please note: *Project Applicants that are selected to move forward in the federal competition are advised to have access to a computer and the internet and also have an understanding of basic computer use.*

AHCDD may offer limited technical assistance and will be available to answer questions about the electronic submission process. AHCDD staff will *not* offer any basic computer training or related assistance.

Finally, AHCDD staff is available to provide more information or to answer specific questions you may have about the local and federal application process. Please contact us at 706-821-1797 or check AHCDD's website at www.augustaga.gov for further information. Also, remember that additional information regarding the HUD Continuum of Care Funding Competition can also be found at www.onecpd.info as it becomes available for the funding cycle.

Procurement Conditions

1. Priorities
   Major priorities this year will be identifying one or more providers of permanent supportive housing for chronic homeless persons and / or families.

2. Negotiations
   AHCDD, on behalf of the CoC, reserves the right to negotiate with potential grantees relative to pricing, technical information, and/ or other items for their proposals.

3. CoC Homeless Program Questions
   Questions regarding the CoC Homeless Program and/ or procurement processes must be sent, via e-mail, to augustagacoc@gmail.com and in the subject line, please type: **CoC Question FY2014** to ensure that the e-mail is properly routed. Please note that AHCDD Staff and CoC Executive

   CoC Executive Committee Members are only permitted to answer questions and shall not provide assistance that may provide a competitive advantage to a proposal.

4. Section 3 Compliance
   Applicants should be aware that all projects proposing rehabilitation or new construction shall be required to conduct outreach to employ low- and very low-income persons per the Housing and Urban Development Act of 1968 (known as Section 3).

Modifications: The Continuum reserves the right to issue addenda or amendments to this RFP if the Continuum's Executive Committee considers that additional clarifications are needed. Only those proposers eligible* to receive funding made available under the HUD NOFA will be notified of these changes.

> ***AHCDD Staff will notify the authorized representative identified by the agency of all subsequent submission requirements and meeting dates and locations. Local final submission dates in e-snaps will be October 28th, 2014.**

GENERAL REQUIREMENTS FOR ALL GRANTEES/PROJECT SPONSORS

Please be aware of the following requirements of all grantees and project sponsors.

Financial Requirements Summary

A. CoC funded programs are subject to the uniform policies and requirements of the federal Office of Management and Budget's (OMB) Circulars and Federal regulations implementing the Circulars. The grantee must meet any applicable audit requirements in accordance with the Office of Management and Budget Circulars A-133, A-128, and A-110. The nonprofit grant recipient will be responsible for costs associated with an independent audit. As applicable, the audit must be provided to HUD in a timely manner.

B. Grant Administration
Grantees are responsible for ensuring that homeless assistance funds are administered in accordance with the requirements of applicable laws and program regulations.

C. Performance Reports
All applicants are hereby advised that as a condition of being included in the final application to HUD, all applicants must enter into a Memorandum of Understanding (MOU) with the CoC's Executive Committee. This MOU will provide CoC's Executive Committee necessary access to the applicant's project for monitoring and evaluation purposes. In addition, the applicant will be required to provide quarterly performance reports and the Annual Performance Report (APR) filed with HUD to the CoC's Executive Committee.

D. Record-keeping
Each grantee must ensure that records are maintained for a three-year period after the final expenditure to document compliance with the provisions of the program regulations, and to make them available to HUD upon reasonable advance notice.

Grantees are expected to use standard accounting practices in their fiscal recordkeeping.

E. Timely Use of Funds
Grantees are expected to utilize McKinney-Vento assistance in a timely manner. The program regulations make clear the standards that grantees will be held to regarding program implementation. HUD reserves the right to recapture funds not committed within 12-months of grant execution.

F. Sanctions

If the CoC's Executive Committee determines that a grantee is not complying with the McKinney-Vento Act requirements, or with other applicable laws, it may elect to exclude a grantee from future CoC applications.

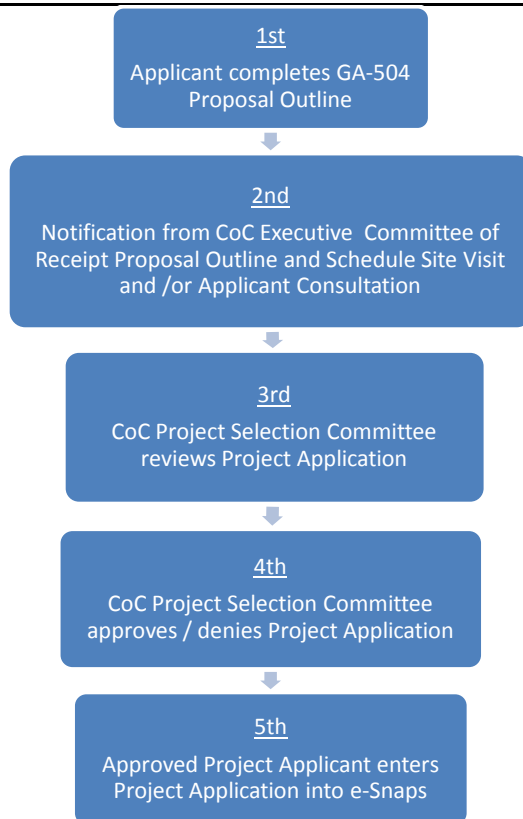G. Homeless Management Information System

Grantees are required to utilize the Homeless Management Information System (HMIS) data tracking system for case management activities. For Augusta – Richmond County, Pathways (www.pcni.org) is the computerized data collection tool specifically designed to capture client-level information over time on:

    1. The characteristics and service needs of men, women, and children experiencing homelessness; and

    2. The services provided to these clients.

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Submission Process

1st
Applicant completes GA-504 Proposal Outline

2nd
Notification from CoC Executive Committee of Receipt Proposal Outline and Schedule Site Visit and /or Applicant Consultation

3rd
CoC Project Selection Committee reviews Project Application

4th
CoC Project Selection Committee approves / denies Project Application

5th
Approved Project Applicant enters Project Application into e-Snaps

Appendix A: Overview, Background and Definitions

Continuum of Care Overview

The Continuum of Care model was adopted by HUD in 1994, requiring local communities to form a primary planning and coordinating body (the CoC) for homeless housing and services to work toward the goal of preventing and ending homelessness. GA-504 includes the incorporated geographic area known commonly as the City of Augusta - Richmond County.

The HEARTH Regulations (§ 578.9 Preparing an application for funds.) require that:

(a) The Continuum must:

(1) Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a NOFA published by HUD under § 578.19 of this subpart;

(2) Establish priorities for funding projects in the geographic area;

(3) Determine if one application for funding will be submitted for all projects within the geographic area or if more than one application will be submitted for the projects within the geographic area;

(i) If more than one application will be submitted, designate an eligible applicant to be the collaborative applicant that will collect and combine the required application information from all applicants and for all projects within the geographic area that the Continuum has selected funding. The collaborative applicant will also apply for Continuum of Care planning activities. If the Continuum is an eligible applicant, it may designate itself;

(ii) If only one application will be submitted, that applicant will be the collaborative applicant and will collect and combine the required application information from all projects within the geographic area that the Continuum has selected for funding and apply for Continuum of Care planning activities;

(b) The Continuum retains all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the Continuum. This includes approving the Continuum of Care application.

The HEARTH regulations clearly define the primary responsibilities of the CoC as follows:

(a) Operate the Continuum of Care. The Continuum of Care must:

(1) Hold meetings of the full membership, with published agendas, at least semi-annually;

(2) Develop an invitation process for new members to join publicly available within the geographic at least annually;

(3) Adopt and follow a written process to select a board to act on behalf of the Continuum of Care. The process must be reviewed, updated, and approved by the Continuum at least once every 5 years;

(4) Appoint additional committees, subcommittees, or workgroups;

(5) In consultation with the collaborative applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B of this part and with HMIS requirements as prescribed by HUD; and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board;

(6) Consult with recipients and sub-recipients to establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and take action against poor performers;

(7) Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD;

(8) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The Continuum must develop a specific policy to guide the operation of the centralized or coordinated assessment system on how its system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. This system must comply with any requirements established by HUD by Notice.

(9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

   (i) Policies and procedures for evaluating individuals and families eligibility for assistance under this part;

   (ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;

   (iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;

   (iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;

   (v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and

   (vi) Where the Continuum is designated a high-performing community, as described in subpart G of this part, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix).

(b) Designating and operating an HMIS. The Continuum of Care must:

   (1) Designate a single Homeless Management Information System (HMIS) for the geographic area;

(2) Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead;

(3) Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS.

(4) Ensure consistent participation of recipients and sub-recipients in the HMIS; and

(5) Ensure the HMIS is administered in compliance with requirements prescribed by HUD.

(c) Continuum of Care planning. The Continuum must develop a plan that includes:

(1) Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses the following:

(i) Outreach, engagement, and assessment;

(ii) Shelter, housing, and supportive services;

(iii) Prevention strategies.

(2) Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:

(i) Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons.

(ii) Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons.

(iii) Other requirements established by HUD by Notice.

(3) Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

(4) Providing information required to complete the Consolidated Plan(s) within the Continuum's geographic area;

(5) Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and sub-recipients.

Definition of Homelessness

The current homeless definition, effective 1/4/2012 has four categories. Currently, HUD CoC Homeless Assistance Program funding can only be used for persons who meet the Category 1, 2 and 3 definitions.

Category 1 – Literally Homeless: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(i) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(ii) An individual who is exiting an institution (e.g., jail, hospital) a. where he or she resided for 90 days or less **AND**

b. Resided in an emergency shelter or place not meant for human habitation immediately before entering the institution

Category 2 – Within 14 days of losing home: An individual or family, who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
(ii) No subsequent residence has been identified; **AND**
(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing

Category 3 - Youth/Children: Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
(i) Meet the homeless definition under another federal statute; **AND**
(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; **AND**
(iii) Have experienced persistent instability as measured by two moves or more during the sixty day period immediately preceding the date of application for homeless assistance; **AND**
(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, OR chronic physical health or mental health conditions, OR substance addiction, OR histories of domestic violence or childhood abuse (including neglect), OR the presence of a child or youth with a disability, OR two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment

Category 4 – Fleeing Domestic Violence: Any individual or family who:
• Is fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
• Has no other residence; **AND**
• Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Chronic Homeless Definition

A person who is "chronically homeless" is an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness in the past three (3) years. In order to be considered chronically homeless, a person must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an Emergency Shelter or Safe Haven."

A chronically homeless family is a household with at least one adult member who has a disabling condition and who has either been continuously homeless for a year or more OR has had a least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter/safe haven during that time.

A disabling condition is defined as "a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions." A disabling condition limits an individual's ability to work or perform one or more activities of daily living. An episode of homelessness is a separate, distinct, and sustained stay on the streets and/or in an emergency homeless shelter.

Note: A revised definition of chronic homeless has been released but has not yet been finalized. The revised definition includes language that the four (4) episodes of homelessness in the past (3) years must cumulatively total one year or more. The proposed new definition is not in effect for the current year's round of funding.

At this time, only persons who fit Categories 1, 2 and 4 of the HUD definition of homelessness may be served by programs supported by HUD CoC Homeless Assistance Programs funding. Organizations interested in serving persons who are at risk of homelessness should investigate other possible funding resources such as Emergency Solutions Grant (ESG), CDBG or HOME funding.

Housing First Model

Housing First is a model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals. Research shows that it is effective for the chronically homeless with mental health and substance abuse disorders, resulting in fewer inpatient stays and less expensive interventions than other approaches. To ensure compliance with the Federal Strategic Plan to End Homelessness (FSP) and increase the likelihood of HUD Funding, PSH projects should use Housing First-based approaches in the design of their programs.

Appendix B: Project Selection Committee Membership

The CoC Executive Committee and AHCDD, as the governing body responsible for CoC oversight and as the lead agency of the Continuum of Care process, respectively, invite and assemble the members of the Project Selection Committee. Members of the Committee are selected by the Continuum of Care convener to ensure proper representation in the process. Members are recruited that represent both the public and private sector as well as from organizations that serve the various homeless sub-populations.

This committee selection assures diverse community-wide participation in the decision making process and ensures that particular groups are not able to protect or monopolize this funding stream. The process has been highly successful in Erie County and has led to a greater understanding of the needs of the local homeless population. Attempts will be made to use Continuum of Care Members whenever possible; however, members of the Project Selection Committee need not be member of AHCDD staff.

The CoC Executive Committee will attempt to avoid even the appearance of impropriety when selecting committee members. Potential conflicts of interest could include:

- Employed or on the Board of Directors of an organization that currently receives HUD CoC Homeless Assistance Program funding
- Participation in the planning of a project or providing technical assistance in the preparation of a project application in either a paid or volunteer capacity.
- Active involvement with, i.e. – Board member, etc. or work for any agency that has a proposal pending.
- Perceived advocacy for a project can also disqualify an individual from serving on the rating and ranking committee.